

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO: 10-266
VERSUS	*	SECTION: "K" (3)
TAMARA SHEREETHA MORRIS	*	
	*	*

FACTUAL BASIS

Should this matter proceed to trial, the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant, TAMARA SHEREETHA MORRIS.

The defendant, TAMARA SHEREETHA MORRIS, has agreed to plead guilty as charged to Count One of the Indictment charging her with a violation of mail fraud in relation to Title 18, United States Code, Section 1341.

A witness from the Southeastern Area of the American Red Cross would testify that in response to the wide spread damages caused by Hurricanes Katrina and Rita in 2005, the America Red Cross (ARC) established numerous assistance centers throughout the multi-state area in September of 2005 until the spring of 2006. This witness would further state that, at these assistance centers, the affected victims of the storms were able to apply for a one-time only financial grant up to \$1,565 from the ARC. In order to receive these funds, the applicants needed to present a picture identification to an ARC representative that indicated residency in the affected area. Applicants were required to attest and sign certifying the applicant had not received any other financial assistance from any other ARC assistance center. ARC made disaster assistance funds available in several ways:

1. A personal check made payable to the applicant, issued on site, and cashed with assistance of the ARC;
2. An ARC issued Discover or Visa Card, issued on site and activated via phone by the applicant;
3. An ARC-issued Client Assistant Card (CAC) issued on site and activated via phone by the applicant; or
4. A personal check authorized by the ARC and mailed through the United States Postal Service to an address provided by the applicant. Paycheck, Inc. a Rochester, New York, based

company volunteered its services to the ARC to process personal checks to applicants as deemed appropriate and authorized by the ARC. These checks were processed and issued to applicants from Rochester, New York, via the United States Postal Service.

An official of the Louisiana Department of Motor Vehicles would testify and submit documentation that a Louisiana Driver's License had been issued to the defendant showing her picture as the current holder of Driver's License No. XXXXX3977. This identification was issued before Hurricanes Katrina or Rita.

A representative of ARC working in the Brookhaven, Mississippi shelter on September 14, 2005 would testify that he interview and reviewed documentation prepared by an individual with the name of the defendant. Additionally, he would testify that on the original Hurricane Katrina intake sheet, he recorded the Louisiana Driver's License number of the defendant as XXXXX3977 after personally reviewing the photographic identification of the defendant. On the defendant's application, she stated her pre-disaster address as 47111 Greco Road, Hammond, Louisiana as well as Post Office Box 643 in Hammond, Louisiana. This application was dated September 14, 2005. As a result of this application, the defendant was issued a check in the amount of \$1,565 by ARC.

An ARC interviewer would testify and introduce documents that she was working at the Picayune, Mississippi ARC shelter on October 1, 2005 when she reviewed an application in the name of the defendant with the address of 47111 Greco Road, Hammond, Louisiana. The applicant presented a Louisiana Driver's License with her picture bearing number XXXXX3977. She will state that the picture on the Louisiana Driver's License matched that of the applicant. Further, the interviewer will state that she specifically asked every applicant if she had applied for Red Cross assistance at other locations. The interviewer will state that the defendant said "no" and this response was indicated with a check in the box which says "no other location." As a result of the defendant's representations, she was issued an ARC check at the Picayune, Mississippi location in the amount of \$1,565.00.

Count 1

An ARC witness working at the ARC assistance center in New Orleans, Louisiana would testify and introduce documents that individual by the name of TAMARA SHERETHA MORRIS and another individual named Steven Morris presented themselves requesting Hurricane Katrina ARC assistance at the facility on October 22, 2005. TAMARA SHERETHA MORRIS signed the application indicating her current address was Post Office Box 643, Hammond, Louisiana.

Additionally, she was asked whether she or Steven Morris has ever applied for Hurricane Katrina assistance with ARC. She indicated neither she nor Steven Morris had applied before. She signed and dated the application on October 22, 2005. As a result of this application, ARC made a request for payment in the amount of \$1,565.00 to Paycheck, Inc. in Rochester, New York. A witness from Paycheck Inc will testify and present records that on or about October 31, 2005, it received a request to pay TAMARA SHEREETHA MORRIS the amount of \$1,565.00 in American Red Cross funds. As a result of this request from ARC, Paycheck, Inc. placed into the United States MAIL on or about October 31, 2005, Check No. 1030001970 in the amount of \$1,565.00 payable to the defendant and mailed to her at Post Office Box 643, Hammond, Louisiana, 70404. This witness will testify that all ARC checks were placed into the United States Mail for delivery from its location in Rochester, New York. A copy of the check would be introduced into evidence indicating the defendant cashed the check on or about November 15, 2005 using her Louisiana Driver's License as an identification and the check was cashed at a convenience store in the Hammond, Louisiana area.

An ARC witness would testify that as a result of the numerous applications made by the defendant, TAMARA SHEREETHA MORRIS, ARC suffered a loss of at least \$7,825.00.

MARVIN OPOTOWSKY	Date
Assistant United States Attorney	
LA Bar Roll No. 10221	

TAMARA SHEREETHA MORRIS	Date
Defendant	

Cynthia Cimino	Date
Assistant Federal Public Defender	
Counsel for Defendant	
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